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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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OUTDOOR PRODUCT INNOVATIONS,  
INC.,

Plaintiff,

vs.

Case No. 1:18-CV-02457

JEST TEXTILES, INC., et al.,

Defendants.

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Deposition of
DANIEL B. REASER

June 19, 2019

10:05 a.m.

Taken at:

Singerman, Mills, Desberg & Kauntz Co., L.P.A.

3333 Richmond Road, Suite 370

Beachwood, Ohio

Renee L. Pellegrino, RPR, CLR

EXHIBIT

3

Veritext Legal Solutions

<p style="text-align: right;">Page 182</p> <p>1 identification.)</p> <p>2 - - - -</p> <p>3 Q. Showing you what's been marked as</p> <p>4 Defendants' Exhibit 21, these are credit card</p> <p>5 authorizations of payments to Jest. Is that</p> <p>6 your signature or Mr. Levis'?</p> <p>7 A. Mine.</p> <p>8 Q. Are you the only one that can sign</p> <p>9 on the credit card?</p> <p>10 A. Yes.</p> <p>11 Q. Is it a company credit card?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know the date of these?</p> <p>14 A. What do you mean?</p> <p>15 Q. The date of the charge.</p> <p>16 A. Not without looking at the records.</p> <p>17 Q. Is that something you guys would</p> <p>18 have, maybe like the credit card statements?</p> <p>19 A. These are -- I'm sure Mr. Levis has</p> <p>20 got something to tie these to.</p> <p>21 Q. Because that was going to be my</p> <p>22 primary question, which is whose signature is</p> <p>23 that and do we know the date of the charges?</p> <p>24 A. He can provide that for you.</p> <p>25 Q. It's your signature but you can't</p>	<p style="text-align: right;">Page 184</p> <p>1 Q. So you referred to yourself in the</p> <p>2 third person calling yourself a bank to Kerry</p> <p>3 and lied and said that the bank wouldn't release</p> <p>4 money?</p> <p>5 A. I didn't lie and I wouldn't say that</p> <p>6 and I would say we were protecting our interests</p> <p>7 because she proved to be a liar over and over</p> <p>8 again with telling us things that weren't true,</p> <p>9 and when we verified, we found out she was lying</p> <p>10 to us, and, therefore, we had to protect our</p> <p>11 interests and this was a way to be able to get</p> <p>12 charges and do back-charges when she didn't</p> <p>13 deliver.</p> <p>14 Q. So we'll go through it -- I hear</p> <p>15 what you're saying. We'll go through it</p> <p>16 component by component.</p> <p>17 You reference a bank. There is no</p> <p>18 bank?</p> <p>19 A. I'm the bank.</p> <p>20 Q. I understand you're referring to</p> <p>21 yourself now in a lawsuit as the bank.</p> <p>22 A. You can look up a definition of the</p> <p>23 bank. I'm the bank.</p> <p>24 Q. There is no bank involved, correct?</p> <p>25 A. There's no third-party bank; is that</p>
<p style="text-align: right;">Page 183</p> <p>1 tell, like I can't tell, the date.</p> <p>2 A. I don't see the date on here.</p> <p>3 Q. Me neither. You can put that down.</p> <p>4 - - - -</p> <p>5 (Thereupon, Defendants' Exhibit 22,</p> <p>6 E-Mail from Dan Reaser to Kerry</p> <p>7 Forsdahl, Maryann Vinci and James</p> <p>8 Levis dated September 10, 2018, was</p> <p>9 marked for purposes of</p> <p>10 identification.)</p> <p>11 - - - -</p> <p>12 Q. Exhibit 22, this is an e-mail from</p> <p>13 you to Kerry and Maryann and Jim, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Dated September 10th of '18?</p> <p>16 A. Yes.</p> <p>17 Q. And it says, "Since the bank won't</p> <p>18 release as much money as you want, how about we</p> <p>19 make arrangements to accept American Express</p> <p>20 credit card number. That would solve the</p> <p>21 problem."</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. What bank won't release what?</p> <p>25 A. The bank of Dan.</p>	<p style="text-align: right;">Page 185</p> <p>1 what you're trying to ask me? I'm not going to</p> <p>2 help you, but I am the bank.</p> <p>3 Q. Again, you're now declaring yourself</p> <p>4 a bank?</p> <p>5 A. In this particular project I was the</p> <p>6 bank, I was the money.</p> <p>7 Q. Are you federally insured and</p> <p>8 regulated by the federal government?</p> <p>9 A. I'm more than that. I'm going to</p> <p>10 make sure we get what we're supposed to get</p> <p>11 before it gets paid for.</p> <p>12 Q. If we're going to be cute --</p> <p>13 A. We're not going to be cute, but</p> <p>14 you're sitting there making a smartass comment</p> <p>15 about me being -- calling myself in the third</p> <p>16 person. I was the bank, I financed this</p> <p>17 project, and the requirements under here were</p> <p>18 that we wanted to use American Express because</p> <p>19 we did not trust what she had not delivered up</p> <p>20 to this point --</p> <p>21 Q. I --</p> <p>22 A. And I'm still talking, okay? And I</p> <p>23 was going to protect our company any way we</p> <p>24 could, and the way to do it was through the</p> <p>25 American Express card. That's the summation of</p>